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June 8, 2004

**CERTIFIED MAIL RECEIPT NO. 91 7108 2133 3930 9238 4479
and FACSIMILE TRANSMISSION**

Brant Levine
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Re: Initial Response to MUR 5447

Dear Mr. Levine:

By letter dated April 29, 2004, you advised the Missouri Republican State Committee - Federal (MRSCF) and its treasurer, Harvey M. Tettlebaum, that the Federal Election Commission (FEC) had opened a new matter under review (MUR 5447) concerning them. MUR 5447 arises out of an FEC audit of the MRSCF covering 1999 and 2000. The FEC subsequently granted MRSCF an extension to respond until June 8, 2004. MRSCF timely submits this initial response to the FEC's findings.

As the Audit report notes, the MRSCF readily complied with the Audit staff's recommendations. Since the Audit concluded, the MRSCF's employment of the person responsible for preparing the 1999-2003 reports has terminated. A new comptroller was hired who is a certified public accountant. In hiring a professional CPA for this position, MRSCF has committed to higher payroll costs to ameliorate the FEC's concerns and to avoid similar reporting errors in the future.

Along with our law firm, the new comptroller has been working to reconcile the MRSCF's accounting records from 2000 going forward with the information previously reported to the FEC. This project has been time consuming and costly. In addition to the comptroller, MRSCF retained another accountant to assist in the reconciliation. MRSCF has already incurred substantial legal fees and other professional fees.

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Amended reports through September 30, 2002 are being electronically filed with the FEC today. Amended reports for the rest of 2002, 2003, and 2004 will be filed in the near future. (The MRSCF is in the process of responding to requests for additional information (RAI) relating to several of its 2003 monthly reports, and will incorporate any changes necessitated by its internal review and the RFAs into one set of amended reports.) As of September 30, 2002, the reconciled bank balance is \$376,023.63, and the reported cash on hand is \$376,202.13 - a difference of only \$178.50. Thus, MRSCF's efforts to address the FEC's concerns have been effective, real, and fruitful.

Thank you for your attention to this letter.

Sincerely,



THOMAS D. VAUGHN

TDV:RLH:cw

cc: Jeff Buker (via hand delivery)
Harvey M. Tettlebaum